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September 27, 2019

VIA ECF

Hon. James Orenstein, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Michael Grecco Prods., Inc. v. Alamy Inc., Case No. 18 Civ. 03260 (PKC) (JO)

Dear Judge Orenstein:

This firm represents defendant Alamy Inc. (“Alamy Inc.”) in the above-captioned action. We write to advise the Court that, after having the opportunity to confer with our client about the issues discussed at the status conference on Monday, September 23, 2019, at 10:30 a.m. before Your Honor (the “Status Conference”), Alamy Inc. has agreed to consent to plaintiff Michael Grecco Productions, Inc.’s (“Plaintiff”) requested amendment of the Complaint without the need for briefing on the issue.¹ The parties jointly respectfully request that the Court allow Plaintiff until October 10, 2019 to file the Amended Complaint,² and that the Court suspend the current briefing schedule, which requires Plaintiff to file a letter motion to amend by September 30, 2019, and requires Alamy Inc. to file a letter response by October 9, 2019.

Additionally, in light of the proposed scheduling changes detailed above, the parties respectfully request that the next status conference, currently scheduled for October 25, 2019, at 11:30 a.m., be adjourned to November 13, 2019, or the next available date that suits the Court. The parties have agreed to defer addressing any discovery disputes relating to the initial phase of discovery until the next status conference.

¹ Additionally, counsel for Alamy Inc. has agreed to accept service of the Amended Complaint on behalf of Alamy Ltd.

² The parties have met and conferred to set intervening deadlines for addressing – hopefully without the need for intervention from the Court – the need to prepare a redacted, publicly available version of the Amended Complaint in light of the anticipated incorporation of certain information and documents produced by Alamy Inc. that have been designated as “Confidential” or “Attorneys’ Eyes Only,” as discussed at the Status Conference.



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We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Nancy E. Wolff

Nancy E. Wolff

cc: All Counsel of Record (via ECF)